

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

MICHAEL BOCK, on behalf of Plaintiff and the class members described herein,

Plaintiff,

v.

WLCC LENDING FDL d/b/a FIRST DAY LOANS;  
WAKPAMNI LAKE COMMUNITY CORPORATION;  
WAKPAMNI LAKE COMMUNITY CORPORATION II d/b/a WLCC II;  
GENEVA LONE HILL;  
BRETT A. CRANDALL III;  
RAYCEN RAINES, III, also known as RAYCEN AMERICAN HORSE RAINES and formerly known as RAYCEN BALLARD; and JOHN DOES 1-20;

Defendants.

Case No. 1:22-cv-01758

**CONSENT MOTION FOR EXTENSION OF TIME  
TO RESPOND TO PLAINTIFF'S COMPLAINT**

Defendant Bret A. Crandall (“Mr. Crandall”) by and through his undersigned counsel, and with the consent of Plaintiff Michael Bock (“Plaintiff”), respectfully requests that the Court enter an order extending the May 20, 2022 deadline to respond to the Complaint in this case to July 5, 2022. In support thereof, Mr. Crandall states as follows:

1. On or about April 5, 2022, Plaintiff filed a class action complaint against defendants WLCC Lending FDL d/b/a First Day Loans; Wakpamni Lake Community Corporation; Wakpamni Lake Community Corporation II d/b/a WLCC II; Geneva Lone Hill; Bret A. Crandall; Raycen Raines III also known as Raycen American Horse Raines and formerly known as Raycen Ballard; and John Does 1-20 (“Defendants”).

2. Mr. Crandall was served on April 29, 2022.

3. Mr. Crandall's response to Plaintiff's Complaint is currently due May 20, 2022.

4. The remaining Defendants executed waivers of service dated May 5, 2022, and their responsive pleading deadline is July 5, 2022.

5. Mr. Crandall requested, and Plaintiff agreed to, an extension of time to answer or otherwise respond to Plaintiff's Complaint, until July 5, 2022 so that his responsive pleading deadline will align with the deadline set forth in the waivers of service executed by the remaining Defendants.

6. This is Mr. Crandall's first request for an extension of time to respond to the Complaint, and this request is not being made for purposes of delay or any other improper reason.

WHEREFORE, the Parties respectfully request this Honorable Court to enter an Order (i) extending the deadline by which Mr. Crandall must respond to Plaintiff's Class Action Complaint up to and including July 5, 2022; and (ii) granting all such other relief it deems equitable and just.

Dated: May 10, 2022

Respectfully submitted,

By: /s/ Matthew J. Goldstein  
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*Counsel for Defendants*